

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO,  
WESTERN DIVISION

ARTHUR R. BELL,	)	Case No. 3:15-cv-01175
	)	
GEORGE PRICE,	)	Case No. 3:15-cv-00632
	)	
FREDERICK HOFER, JR.,	)	Case No. 3:16-cv-00469
	)	
TERRENCE M. MILLER,	)	Case No. 3:15-cv-02698
	)	
JAMES O. COMBS,	)	Case No. 3:16-cv-00139
	)	
EDWARD STROUB,	)	Case No. 3:16-cv-00789
	)	
AARON MILLER,	)	Case No. 3:16-cv-02591
	)	
ANTHONY SOTO,	)	Case No. 3:16-cv-02993
	)	
GERALD HOLMES, JR.	)	Case No. 3:17-cv-00812
	)	
SCOTT D. BEAIR,	)	Case No. 3:15-cv-00322
	)	
Plaintiffs,	)	
	)	
v.	)	<b>DEFENDANTS' STATUS REPORT</b>
	)	
MANAGEMENT & TRAINING CORP.,	)	
	)	
Defendants.	)	

The Defendants Management & Training Corporation and MTC Medical, LLC, submit their status report for the above-referenced cases:

1. WRITTEN DISCOVERY TO PLAINTIFFS

Plaintiff have provided some discovery responses although the verification pages for Plaintiffs Hoffer and Miller are outstanding. Plaintiffs Stroub and A. Miller have not fully

responded to Defendants' discovery. Plaintiffs' counsel advise that this discovery is being completed. Defendant counsel has requested the depositions of various plaintiffs. Plaintiffs Mitchell and Bear (not necessarily part of this case) were scheduled for July 7, 2017. Plaintiffs' counsel advises that Mr. Mitchell is not available on that date. The deposition of Plaintiff Bear will proceed on that date. Defense counsel has repeatedly requested the deposition of Arthur Bell that has not yet been scheduled.

2. TIMELINES

The parties exchanged proposals for discovery timelines in preparation for the May 12, 2017 Pretrial. Plaintiffs request several years to complete discovery. Defendants submit that the discovery could be completed on these cases within nine months.

3. RESPONDEAT SUPERIOR

Plaintiffs' counsel submitted a listing of 30(b) depositions on areas of Management & Training Corporation and MTC Medical, LLC. Plaintiffs requested identification of individuals who might testify. Defendants advise that Dr. Keaton and Neil Turner, as representatives of MTC Medical and MTC, would be the individuals most knowledgeable for 30(b) depositions. On June 21, 2017, Plaintiffs' counsel submitted additional identification of respondeat superior topics. That June 21, 2017 correspondence is attached to the June 23, 2017 status report filed by Plaintiffs' counsel. A listing of individuals and the dates they started with NCCC is attached hereto as **Exhibit A**. All individuals can be contacted through defense counsel.

4. MISCELLANEOUS

Plaintiffs' counsel have advised they will be filing new Complaints in the cases of Velarde, Lewis, J. Kelley, and D. Walker.

Respectfully submitted,

/s/ Timothy T. Reid

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**CERTIFICATE OF SERVICE**

A copy of the foregoing *DEFENDANTS' STATUS REPORT* was filed electronically this 27<sup>th</sup> day of June 2017. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Timothy T. Reid

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*Attorney for Defendants*